

# START

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## Department of Energy

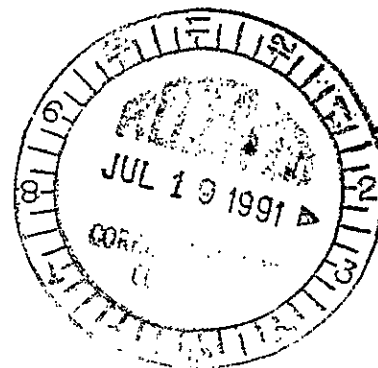
Richland Operations Office  
P.O. Box 550  
Richland, Washington 99352

JUN 28 1991

91-EAB-156

Mr. Paul T. Day  
Hanford Project Manager  
U.S. Environmental Protection Agency  
Region 10  
712 Swift Blvd., Suite 5  
Richland, Washington 99352

Mr. Timothy L. Nord  
Hanford Project Manager  
State of Washington  
Department of Ecology  
Mail Stop PV-11  
Lacey, Washington 98503



Dear Messrs. Day and Nord:

### HANFORD DANGEROUS WASTE TANK SYSTEM COMPLIANCE

Since our 1st negotiating session on the new milestone in the Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) for a Dangerous Waste Tank System Compliance Plan, the U.S. Department of Energy, Richland Operations Office (DOE-RL) has re-evaluated its proposed schedule. Please find enclosed a revised schedule. We would like to discuss this proposed schedule at our next negotiating session.

Please contact Mr. Steve D. Stites, DOE-RL, on (509) 376-8556, or Mr. Bradley Erlandson, Westinghouse Hanford Company, on (509) 376-5959, to arrange the next negotiating session.

Sincerely,

*Steven H. Wisness*  
Steven H. Wisness, Manager  
Tri-Party Agreement Project Office

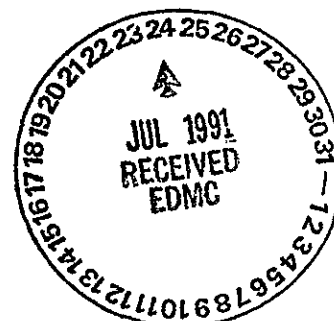
ERD:SDS

Enclosure:

cc w/o encl:

R. E. Lerch, WHC

~~T. B. Veneziano, WHC~~



**PROPOSED INTERIM STATUS TANK HANFORD FEDERAL FACILITY  
AGREEMENT AND CONSENT ORDER MILESTONES**

<b>M-XX-00</b>	<b>Complete Dangerous Waste Tank Corrective Actions</b>	<b>Apr. 96</b>
	Complete dangerous waste tank interim status corrective actions excluding activities identified in M-23-00 and additional actions resulting from performance of tank system integrity assessments or engineering studies.	
	Scheduled completion dates for tank system integrity assessment reports are contingent upon State acceptance of integrity assessment plans.	
	Additional corrective actions identified through performance of tank integrity assessments will be considered for inclusion in Milestone M-XX-00. These additional actions identified may not be completed prior to April 1996.	
<b>M-XX-01</b>	<b>Complete Dangerous Waste Tank Interim Status Target Actions for the Plutonium Finishing Plant (PFP).</b>	<b>July 95</b>
Target	Complete Integrity Assessment Plan for PFP Interim Status Tank System.	Sept. 91
Target	Complete Engineering Study to Evaluate Secondary Containment Upgrades for Building 234-5Z Waste Piping.	Mar. 92
Target	Complete Integrity Assessment Report for PFP Interim Status Tank System.	Sept. 92
Target	Complete Interim Status Tank Upgrades for 241-Z Tank System.	July 95
<b>M-XX-02</b>	<b>Complete Dangerous Waste Tank Interim Status Target Actions for T Plant.</b>	<b>Sept. 92</b>
Target	Complete Integrity Assessment Plan for T Plant Interim Status Tank System.	Sept. 91
Target	Complete Integrity Assessment Report for T Plant Interim Status Tank System.	Sept. 92
Target	Complete T Plant Engineering Study to Determine Necessary Secondary Containment/Leak Detection Upgrades.	Sept. 91

M-XX-03	Complete 219-S Tank Interim Status Target Actions.	Apr. 96
Target	Complete 219-S Engineering Study to Determine Appropriate Secondary Containment Upgrades.	May 91
Target	Upgrade Existing Transfer Lines to Meet Secondary Containment Requirement.	Apr. 96
M-XX-04	Complete Grout Interim Status Tank Target Actions.	March 92
Target	Complete Integrity Assessment Report for Grout Interim Status Tank System.	March 92
M-XX-05	Complete Double-Shell Tank Interim Status Tank Target Actions.	Sept. 91
Target	Identify Proposed Upgrades to Address Tank Farm Transfer Equipment Secondary Containment Deficiencies. Schedule for Completion of Conceptual Design Reports will be Included with Proposal.	July 91
Target	Issue a Certified Integrity Assessment Report for 241-AW Tank Farm that Addresses Completion of All Aspects of the Tank Portion of the Assessment Except Ultrasonic Testing.	Sept. 91
Target	Issue a Tank Integrity Assessment Program Plan Identifying Milestones and Schedules for Completing the Double Shell Tank Integrity Assessment Plans and Reports.	Sept. 91
M-XX-06	Complete 242-A Evaporator Interim Status Tank Target Actions.	Sept. 91
Target	Complete Integrity Assessment Report for Evaporator Interim Status Tank System.	Sept. 91

M-XX-07	Complete PUREX Interim Status Tank Target Actions.	Sept. 92
Target	Submit Request for Approval of Equivalent Secondary Containment for PUREX.	May 91
Target	Complete Integrity Assessment Plan for Interim Status Tank Systems that will be used by PUREX during the Standby Period.	July 91
Target	Complete Integrity Assessment Report for Interim Status Tank Systems that will be used by PUREX During Standby Period.	Sept. 92
M-XX-08	Complete B Plant Interim Status Tank Target Actions.	Dec. 94
Target	Complete Integrity Assessment Plan for Interim Status Tank Systems, excluding tanks required for pretreatment of tank waste.	June 93
Target	Complete Integrity Assessment Report for Interim Status Tank Systems, excluding tanks required for pretreatment of tank waste.	Dec. 94

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Dear Messrs. Day and Nord:

#### HANFORD DANGEROUS WASTE TANK SYSTEM COMPLIANCE

The Washington Administrative Code 173-303-640, "Tank Systems," requires that: (1) an integrity assessment for dangerous waste tank systems be performed by January 12, 1990, and (2) for waste tank systems greater than 15 years of age, secondary containment be provided by January 12, 1991. As manifested in our ongoing negotiations with your staff to establish a Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) Milestone for dangerous waste tank system compliance, it is apparent that many of Hanford's active dangerous waste tank systems are not operated in accordance with these requirements.

Unless evidence of unsafe operating conditions exist, it is our intent to continue operation of these tanks while pursuing approval of a Tri-Party Agreement Milestone. A proposed corrective action schedule for Hanford's dangerous waste tank systems is enclosed to reestablish our negotiations. It is important to note that, although a corrective action schedule has not been approved by all parties, the U.S. Department of Energy, Richland Operations Office (DOE-RL) is working to correct the known deficiencies according to the schedules identified in the enclosure.

Since our last negotiating session on the new Milestone in the Hanford Federal Facility Agreement and Consent Order for a dangerous waste tank system compliance plan, DOE-RL has re-evaluated its proposed schedule. Please find attached a revised schedule. We would like to discuss this proposed schedule at our next negotiating session.

Please contact Mr. Steve D. Stites, DOE-RL, (509)376-8566, or Mr. Bradley Erlandson, Westinghouse Hanford Company, (509) 376-5959, to arrange the next negotiating session.

# CORRESPONDENCE DISTRIBUTION COVERSHEET

Author	Addressee	Correspondence No.
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Subject: HANFORD DANGEROUS WASTE TANK SYSTEM COMPLIANCE

## INTERNAL DISTRIBUTION

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		T. B. Veneziano.	B2-35	X
		R. D. Wojtasek	L4-92	X
		EDMC	H4-22	X



Note: New Milestone M-32-00, pending 1991 negotiations.